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7 October 2003

Ms. Gwendolyn Massenburg
Remedial Project Manager
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
77 West Jackson Boulevard, Mailcode SR-6J
Chicago, Illinois 60604-3590

Reference: Shallow Monitoring Wells – Proposed Change to Work Plan
Chemical Recovery Systems, Inc. (CRS) Site
Elyria, Lorain County, Ohio

Dear Ms. Massenburg:

For the reasons stated below, the CRS Site Group requests a change to the approved RI/FS Work Plan to forego installing shallow groundwater monitoring wells planned for areas where shallow groundwater has not been detected.

The conceptual site model (CSM) (Figure 3-1 – attached) associated within the United States Environmental Protection Agency (U.S. EPA) approved Remedial Investigation/Feasibility Study (RI/FS) Work Plan was based, in part, on the premise that there were multiple distinct and definable historic sources or areas of concern (AOC) (Rodney Hunt still building, Brighten still building and above ground storage tank (AST) farm, drum storage areas, tanker storage areas and storm sewer outfall) on the referenced property. As such, the initial phase of field work included advancing 40 direct-push soil borings (five in each AOC – in the center and to the north, south, east and west) and collecting soil samples for field and laboratory analysis for the purpose of defining the extent of each historic source area. In addition, the CSM was based, in part, on the premise that there was abundant shallow groundwater in the unconsolidated material (mostly fill), which overlies sandstone bedrock. Following this line of reason, the initial phase of field work also included the installation of eight temporary groundwater monitoring points.

A review of the analytical results from soil samples collected from the borings indicates that the majority of the samples were impacted with chemicals of concern (COCs). Although the type and concentrations of COCs (e.g., volatile organic compounds (VOCs) or semi-volatile organic compounds (SVOCs)) may differ from one location to another at the site, there are no distinct, definable AOCs (sources) at the site as originally assumed in the CSM. Therefore, the entire site is considered to be one source area (AOC).

In addition, a review of the lithologic data collected during the initial phase of field work indicated that, although the subsurface is mostly fill, there were only three locations (GP-6, GP-14 and GP-16 (Figure 5-1 – attached)) where groundwater was encountered in the unconsolidated material above the sandstone bedrock. The presumption that groundwater would be widespread in the unconsolidated material across the site has been disproved. Based on analytical results from the groundwater samples collected from the three temporary monitoring points, the shallow groundwater encountered is impacted with COCs. Also, previous groundwater sampling events indicate that monitoring wells MW-1 and MW-2 (installed in unconsolidated material) are impacted. Thus, it has been determined that what shallow groundwater is available at the site is impacted.

Based on the lithologic and analytical data now available from the first phase of RI activities, the CSM and the assumptions used to determine the need for the installation of permanent monitoring wells in the unconsolidated material, has been reviewed and adjusted. Installing shallow wells at the site to determine if specific AOCs are contributing COCs to the groundwater is no longer necessary. This rationale is based on the following:

- Soil data indicates that there are not multiple distinct AOCs, but rather one large AOC (the site);
- Groundwater is not widespread throughout the unconsolidated material across the site (only three out of eight temporary monitoring points had groundwater to sample); and,
- The groundwater encountered in the unconsolidated material is impacted with COCs.

It is the opinion of the CRS Site Group that shallow monitoring wells are no longer needed to determine and define impact. In addition, with the discovery of MW-1, there are now four shallow monitoring wells (MW-1 and MW-2 on the CRS property and L-2 and L-3 up gradient and offsite) that can be used to evaluate the shallow groundwater within the unconsolidated material. Attempts will be made to verify the integrity of MW-1 and MW-2 in the field. These four shallow monitoring wells and three temporary monitoring points (seven total) will be sufficient to evaluate the shallow groundwater and the risk to human health and the environment.

The CRS Site Group proposes installing the three deep monitoring wells as outlined in the RI/FS Work Plan. However, the CRS Site Group requests that you approve a change in the Work Plan that eliminates the installation of the five proposed shallow wells because groundwater is not present in these areas based on the above information. Further, sufficient data for developing the risk assessment for the site are available from other sources and locations.

If you have any questions or desire additional information, please do not hesitate to contact us.

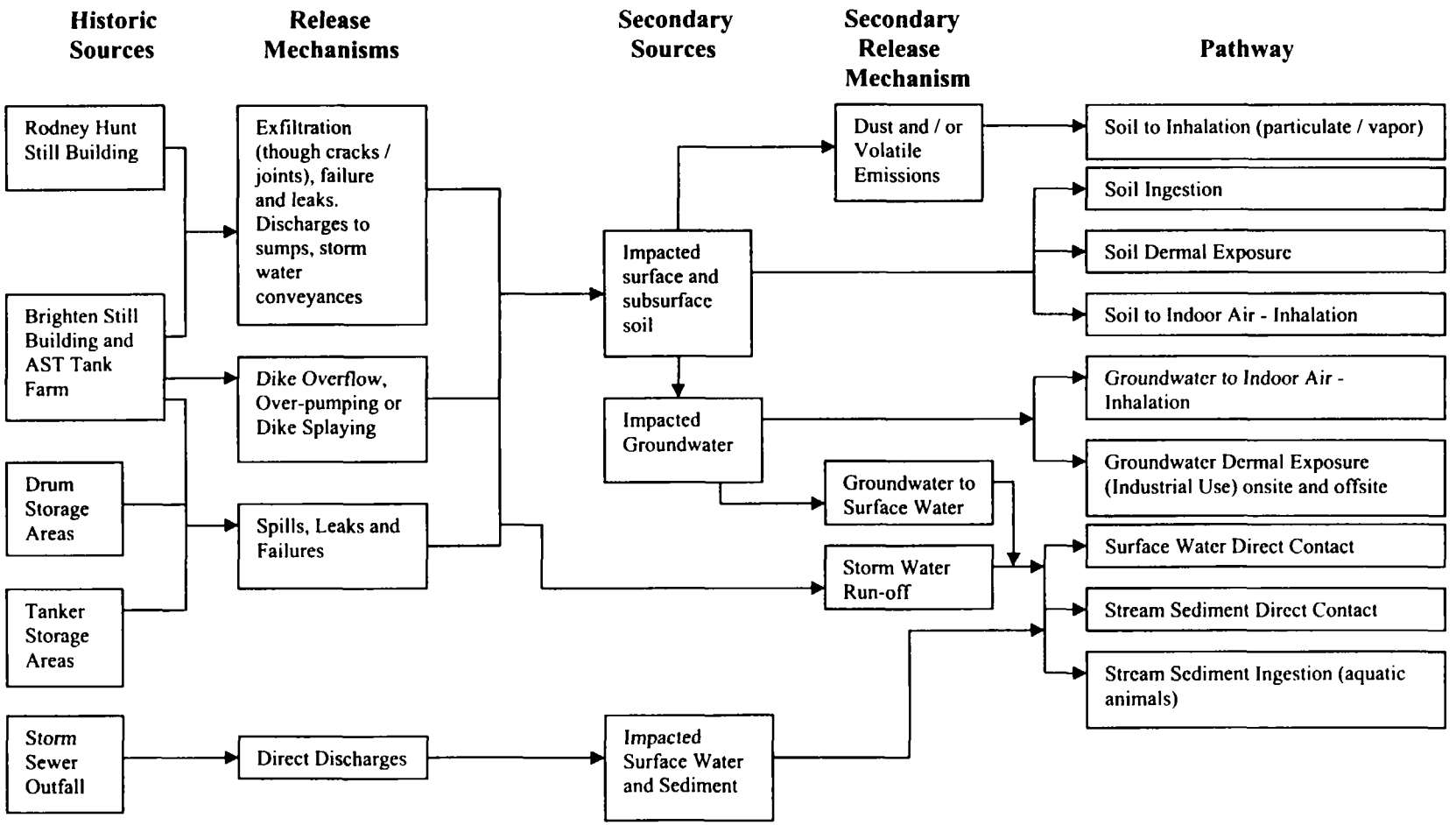
Very truly yours,
PARSONS

P. Gelman

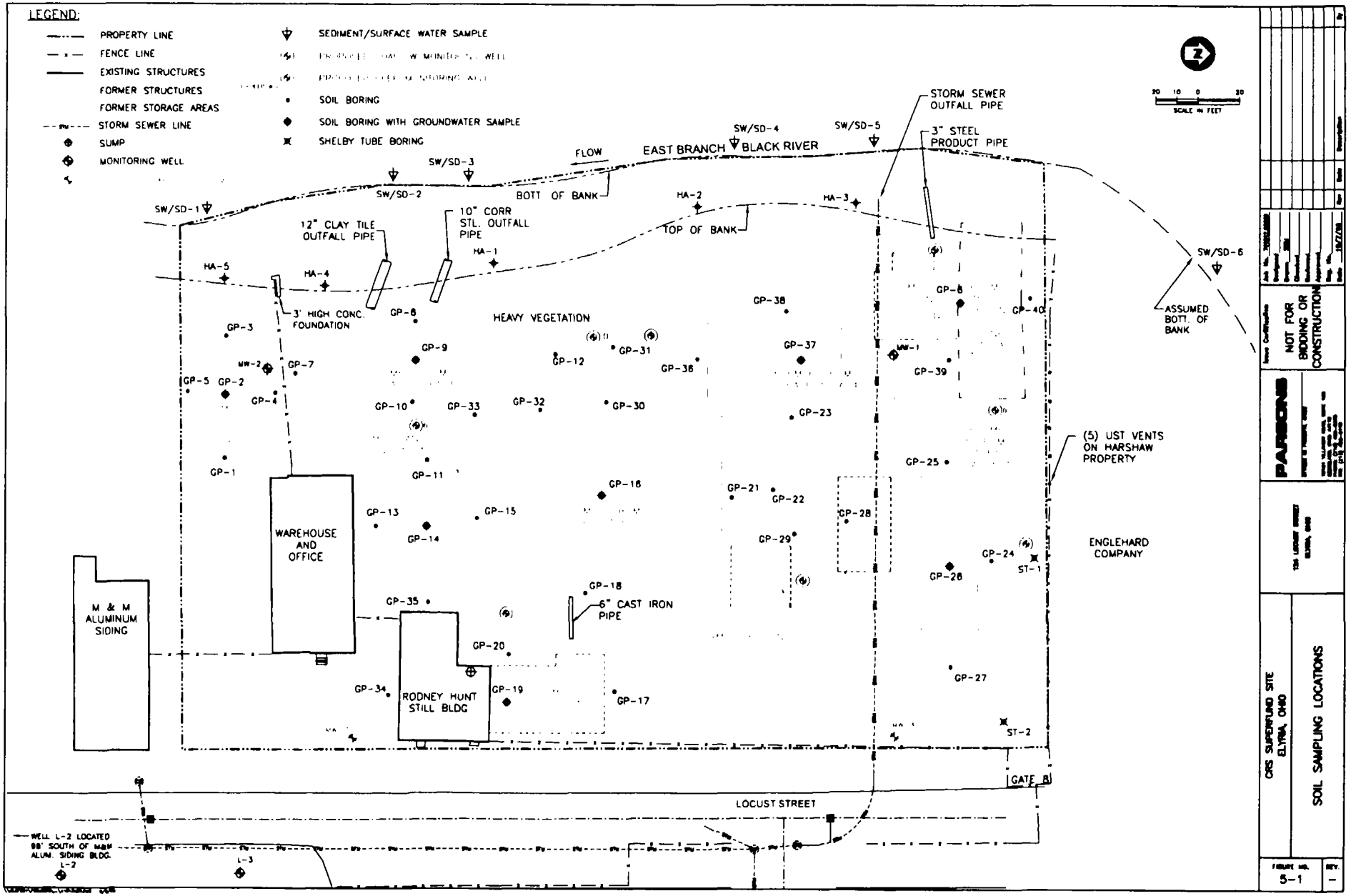
Peter Gelman, PE
Project Manager

cc: Thomas C. Nash, Associate Regional Counsel, U.S. EPA
Lawrence Antonelli, Ohio EPA
Gary Gifford, CRS Technical Committee Chairperson
Douglas A. McWilliams, CRS Group Chairperson

Figure 3-1
Conceptual Site Model
CRS Site
Elyria, OH



* For the purposes of this Conceptual Site Model, groundwater to surface water ingestion and surface water to groundwater were not considered complete.


LEGEND:
PROPERTY LINE
FENCE LINE
EXISTING STRUCTURES
FORMER STRUCTURES
FORMER STORAGE AREAS
STORM SEWER LINE
SUMP
MONITORING WELL
SEDIMENT/SURFACE WATER SAMPLE
SOIL BORING
SOIL BORING WITH GROUNDWATER SAMPLE
SHELBY TUBE BORING
SCALE IN FEET
STORM SEWER OUTFALL PIPE
3" STEEL PRODUCT PIPE
EAST BRANCH BLACK RIVER
FLOW
BOTT OF BANK
TOP OF BANK
SW/SD-1
SW/SD-2
SW/SD-3
SW/SD-4
SW/SD-5
SW/SD-6
HA-1
HA-2
HA-3
HA-4
HA-5
12" CLAY TILE OUTFALL PIPE
10" CORR STL. OUTFALL PIPE
3' HIGH CONC. FOUNDATION
HEAVY VEGETATION
ASSUMED BOTT. OF BANK
(5) UST VENTS ON HARSHAW PROPERTY
ENGLEHARD COMPANY
WAREHOUSE AND OFFICE
M & M ALUMINUM SIDING
RODNEY HUNT STILL BLDG
6" CAST IRON PIPE
GATE B
LOCUST STREET
WELL L-2 LOCATED 88' SOUTH OF M&M ALUM. SIDING BLDG.
GP-1
GP-2
GP-3
GP-4
GP-5
GP-6
GP-7
GP-8
GP-9
GP-10
GP-11
GP-12
GP-13
GP-14
GP-15
GP-16
GP-17
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GP-32
GP-33
GP-34
GP-35
GP-36
GP-37
GP-38
GP-39
GP-40
MW-1
MW-2
ST-1
ST-2
NOT FOR BIDDING OR CONSTRUCTION
PARSONS
ORS SUPERFUND SITE
ELYRIA, OHIO
SOIL SAMPLING LOCATIONS
FIGURE NO. 5-1
REV. -